The Honorable Ronald B. Leighton Jack D. Hoffman, OSB No. 761732 E-Mail: jhoffman@dunncarney.com Elizabeth E. Howard, WSBA No. 43398 E-Mail: ehoward@dunncarney.com Kate L. Moore, OSB No. 043342 E-Mail: kmoore@dunncarney.com Dunn Carney Allen Higgins & Tongue LLP 851 SW Sixth Avenue, Suite 1500 Portland, OR 97204 5 Telephone: (503) 224-6440 Facsimile: (503) 224-7324 6 Attorneys for Plaintiff 7 Eric D. Lansverk, WSBA No. 17218 E-Mail: edl@hcmp.com Hills Clark Martin & Peterson 1221 2nd Avenue, Suite 500 Seattle, WA 98101-2989 10 Telephone: (206) 623-1745 Facsimile: (206) 623-7789 11 Attorneys for Plaintiff 12 13 Kent E. Hanson E-Mail: kent.hanson@usdoj.gov Austin D. Saylor E-Mail: austin.saylor@usdoj.gov 15 Davis S. Fishback E-Mail: david.fishback@usdoj.gov 16 United States Department of Justice P.O. Box 23986 Washington, DC 20044 Telephone: 202.514.1880 18 Attorneys for Defendant Maritime Administration and United States Department of Transportation 19 Svend A. Brandt-Erichsen, WSBA No. 23923 20 E-Mail: svendbe@martenlaw.com Steven G. Jones, WSBA No. 19334 E-Mail: sjones@martenlaw.com Marten Law Group PLLC 1191 Second Avenue, Suite 2200 Seattle, WA 98101-3421 23 Telephone: 206.292.2600 Facsimile: 206.292.2601 24 Attorneys for Defendants Kaiser Ventures LLC, KSC Recovery, Inc., Kaiser Steel 25 Corporation, and Kaiser Company Inc. 26 ///// STIPULATED DISMISSAL WITH PREJUDICE AND WITHOUT COSTS Page 1

DCAPDX 914208 v1

	1	Howard F. Jensen, WSBA No. 25144				
	0	E-Mail: howard@verislawgroup.com				
	2	Alison Jones Robinson, WSBA No. 37957				
	2	E-Mail: <u>alison@verislawgroup.com</u> Joshua C. Bower, WSBA No. 25092				
	3	E-Mail: josh@verislawgroup.com				
	4	Veris Law Group PLLC				
	7	1809 Seventh Avenue, Suite 1400				
	5	Seattle, WA 98101				
		Telephone: 206-829-8429				
	6					
	7	7 Attorneys for Defendants Evraz Oregon Steel Mills, Inc.				
	8	UNITED STATES D	ISTRICT COURT			
	O	WESTERN DISTRICT OF WASHINGTON				
	9	AT TACOMA				
	10	IRON PARTNERS, LLC, an Oregon limited	No. COO 5017 DDI			
	1 1	liability company,	No. C08-5217 RBL			
	11	Plaintiff,	STIPULATED DISMISSAL			
	12	V.	WITH PREJUDICE AND			
	1 4		WITHOUT COSTS			
	13	MARITIME ADMINISTRATION, UNITED				
		STATES DEPARTMENT OF				
	14	TRANSPORTATION; KAISER VENTURES,				
		LLC; KSC RECOVERY, INC.; KAISER				
	15	STEEL CORPORATION; and KAISER				
	1.6	COMPANY, INC.,				
	16	Defendants.				
	17	V.				
	X /					
	18	KAISER VENTURES LLC; KSC				
		RECOVERY, INC.; KAISER STEEL				
	19	CORPORATION; and KAISER COMPANY,				
	•	INC.,				
	20	Third-Party Plaintiffs,				
	21					
	21	V.				
	22	EVRAZ OREGON STEEL MILLS, INC.,				
	- 12					
	23	Third-Party Defendant.				
	24	Pursuant to Fed R Civ P 41(a)(1)(ii) th	e parties, by and through their counsel, hereby			
	<i></i> 1					
	25	25 stipulate that all claims shall be dismissed with prejudice and without attorney fees,				
	26	disbursements to any party.				
D.	age 2	STIPULATED DISMISSAL WITH PREJUI	DICE AND WITHOUT COSTS			
16	ige Z	DCAPDX_914208_v1				
		IRO3-2				

1	IT IS SO STIPULATED:	
2		
3	DUNN CARNEY ALLEN HIGGINS & TONGUE, LLP	UNITED STATES DEPARTMENT OF JUSTICE
4	\bigcap	
5	Jack D. Hoffman, OSB No. 761732	Kent E. Hanson
6	jhoftman@dunncarney.com Elizabeth F. Howard, WSBA No. 43398	kent.hanson@usdoj.gov Austin D. Saylor
7	ehoward@dunncarney.com Kate L. Moore, OSB No. 043342	austin.saylor@usdoj.gov Davis S. Fishback
8	kmoore@dunncarney.com	david.fishback@usdoj.gov
9	Attorneys for Plaintiff	Attorneys for Defendant Maritime
10	DATED: March 18, 2013	Administration and United States Department of Transportation
11		DATED:, 2013
12	MARTEN LAW GROUP PLLC	VERIS LAW GROUP PLLC
13		
14		
ĻΤ	Svend A Brandt-Frichsen WSBA No 23923	Howard F. Jensen, WSBA No. 25144
15	Svend A. Brandt-Erichsen, WSBA No. 23923 svendbe@martenlaw.com	Howard F. Jensen, WSBA No. 25144 E-Mail: howard@verislawgroup.com
		E-Mail: howard@verislawgroup.com Alison Jones Robinson, WSBA No. 37957 E-Mail: alison@verislawgroup.com
15 16	svendbe@martenlaw.com Steven G. Jones, WSBA No. 19334 sjones@martenlaw.com Attorneys for Defendants Kaiser Ventures	E-Mail: howard@verislawgroup.com Alison Jones Robinson, WSBA No. 37957
15 16 17	svendbe@martenlaw.com Steven G. Jones, WSBA No. 19334 sjones@martenlaw.com Attorneys for Defendants Kaiser Ventures LLC, KSC Recovery, Inc., Kaiser Steel	E-Mail: howard@verislawgroup.com Alison Jones Robinson, WSBA No. 37957 E-Mail: alison@verislawgroup.com Joshua C. Bower, WSBA No. 25092 E-Mail: josh@verislawgroup.com Attorneys for Defendants Evraz Oregon Steel
15 16 17 18	svendbe@martenlaw.com Steven G. Jones, WSBA No. 19334 sjones@martenlaw.com Attorneys for Defendants Kaiser Ventures LLC, KSC Recovery, Inc., Kaiser Steel Corporation, and Kaiser Company Inc.	E-Mail: howard@verislawgroup.com Alison Jones Robinson, WSBA No. 37957 E-Mail: alison@verislawgroup.com Joshua C. Bower, WSBA No. 25092 E-Mail: josh@verislawgroup.com
15 16 17 18 19	svendbe@martenlaw.com Steven G. Jones, WSBA No. 19334 sjones@martenlaw.com Attorneys for Defendants Kaiser Ventures LLC, KSC Recovery, Inc., Kaiser Steel	E-Mail: howard@verislawgroup.com Alison Jones Robinson, WSBA No. 37957 E-Mail: alison@verislawgroup.com Joshua C. Bower, WSBA No. 25092 E-Mail: josh@verislawgroup.com Attorneys for Defendants Evraz Oregon Steel
15 16 17 18	svendbe@martenlaw.com Steven G. Jones, WSBA No. 19334 sjones@martenlaw.com Attorneys for Defendants Kaiser Ventures LLC, KSC Recovery, Inc., Kaiser Steel Corporation, and Kaiser Company Inc.	E-Mail: howard@verislawgroup.com Alison Jones Robinson, WSBA No. 37957 E-Mail: alison@verislawgroup.com Joshua C. Bower, WSBA No. 25092 E-Mail: josh@verislawgroup.com Attorneys for Defendants Evraz Oregon Steel Mills, Inc.
15 16 17 18 19	svendbe@martenlaw.com Steven G. Jones, WSBA No. 19334 sjones@martenlaw.com Attorneys for Defendants Kaiser Ventures LLC, KSC Recovery, Inc., Kaiser Steel Corporation, and Kaiser Company Inc.	E-Mail: howard@verislawgroup.com Alison Jones Robinson, WSBA No. 37957 E-Mail: alison@verislawgroup.com Joshua C. Bower, WSBA No. 25092 E-Mail: josh@verislawgroup.com Attorneys for Defendants Evraz Oregon Steel Mills, Inc.
15 16 17 18 19 20	svendbe@martenlaw.com Steven G. Jones, WSBA No. 19334 sjones@martenlaw.com Attorneys for Defendants Kaiser Ventures LLC, KSC Recovery, Inc., Kaiser Steel Corporation, and Kaiser Company Inc.	E-Mail: howard@verislawgroup.com Alison Jones Robinson, WSBA No. 37957 E-Mail: alison@verislawgroup.com Joshua C. Bower, WSBA No. 25092 E-Mail: josh@verislawgroup.com Attorneys for Defendants Evraz Oregon Steel Mills, Inc.
15 16 17 18 19 20 21	svendbe@martenlaw.com Steven G. Jones, WSBA No. 19334 sjones@martenlaw.com Attorneys for Defendants Kaiser Ventures LLC, KSC Recovery, Inc., Kaiser Steel Corporation, and Kaiser Company Inc.	E-Mail: howard@verislawgroup.com Alison Jones Robinson, WSBA No. 37957 E-Mail: alison@verislawgroup.com Joshua C. Bower, WSBA No. 25092 E-Mail: josh@verislawgroup.com Attorneys for Defendants Evraz Oregon Steel Mills, Inc.
15 16 17 18 19 20 21 22	svendbe@martenlaw.com Steven G. Jones, WSBA No. 19334 sjones@martenlaw.com Attorneys for Defendants Kaiser Ventures LLC, KSC Recovery, Inc., Kaiser Steel Corporation, and Kaiser Company Inc.	E-Mail: howard@verislawgroup.com Alison Jones Robinson, WSBA No. 37957 E-Mail: alison@verislawgroup.com Joshua C. Bower, WSBA No. 25092 E-Mail: josh@verislawgroup.com Attorneys for Defendants Evraz Oregon Steel Mills, Inc.
15 16 17 18 19 20 21 22 23	svendbe@martenlaw.com Steven G. Jones, WSBA No. 19334 sjones@martenlaw.com Attorneys for Defendants Kaiser Ventures LLC, KSC Recovery, Inc., Kaiser Steel Corporation, and Kaiser Company Inc.	E-Mail: howard@verislawgroup.com Alison Jones Robinson, WSBA No. 37957 E-Mail: alison@verislawgroup.com Joshua C. Bower, WSBA No. 25092 E-Mail: josh@verislawgroup.com Attorneys for Defendants Evraz Oregon Steel Mills, Inc.
15 16 17 18 19 20 21 22 23 24	svendbe@martenlaw.com Steven G. Jones, WSBA No. 19334 sjones@martenlaw.com Attorneys for Defendants Kaiser Ventures LLC, KSC Recovery, Inc., Kaiser Steel Corporation, and Kaiser Company Inc.	E-Mail: howard@verislawgroup.com Alison Jones Robinson, WSBA No. 37957 E-Mail: alison@verislawgroup.com Joshua C. Bower, WSBA No. 25092 E-Mail: josh@verislawgroup.com Attorneys for Defendants Evraz Oregon Steel Mills, Inc. DATED:

IT IS SO STIPULATED:

DUNN CARNEY ALLEN HIGGINS & TONGUE, LLP	UNITED STATES DEPARTMENT OF JUSTICE
Jack D. Hoffman, OSB No. 761732 jhoffman & dunnearney com Elizabeth F. Howard WSBA No. 43398 ehoward & dunnearney com Kate L. Moore, OSB No. 043342 kmoore & dunnearney com	Kent U. Hanson/ kent hanson/a/isdoj_gov Austin D. Saylor austin saylor a/usdoj_gov Davis S. Fishback david,fishback/a/usdoj.gov
Attorneys for Plaintiff DATED:, 2013	Altorneys for Defendant Maritime Administration and United States Department of Transportation
	DATED: March 13, 2013
MARTEN LAW GROUPPLLG	VERIS LAW GROUP PLLC
Svend A. Brandt-Erichsen, WSBA No. 23923 svendbe amartenlaw.com Steven G. Jones, WSBA No. 19334 sjones@martenlaw.com Attorneys for Defendants Kaiser Ventures LLC. KSC Recovery, Inc., Kaiser Steel	Howard F. Jensen, WSBA No. 25144 E-Mail: howard a verislawgroup.com Alison Jones Robinson, WSBA No. 37957 E-Mail: alison@verislawgroup.com Joshua C. Bower, WSBA No. 25092 E-Mail: josh@verislawgroup.com
DATED: Mark 13. 2013	Attorneys for Defendants Evraz Oregon Steel Mills, Inc.
2000.2120.2	DATED: 2013

IT IS SO STIPULATED:

DUNN CARNEY ALLEN HIGGINS & TONGUE, LLP	UNITED STATES DEPARTMENT OF JUSTICE
Jack D. Hoffman, OSB No. 761732 jhoffman@dunncarney.com Elizabeth F. Howard, WSBA No. 43398 ehoward@dunncarney.com Kate L. Moore, OSB No. 043342 kmoore@dunncarney.com	Kent E. Hanson kent.hanson@usdoj.gov Austin D. Saylor austin.saylor@usdoj.gov Davis S. Fishback david.fishback@usdoj.gov
Attorneys for Plaintiff DATED:, 2013	Attorneys for Defendant Maritime Administration and United States Department of Transportation
	DATED:, 2013
MARTEN LAW GROUP PLLC	VERIS LAW GROUP PLLC
Svend A. Brandt-Erichsen, WSBA No. 23923 svendbe@martenlaw.com Steven G. Jones, WSBA No. 19334 sjones@martenlaw.com Attorneys for Defendants Kaiser Ventures	Howard F. Jensen, WSBA No. 25144 E-Mail: howard@verislawgroup.com Alison Jones Robinson, WSBA No. 37957 E-Mail: alison@verislawgroup.com Joshua C. Bower, WSBA No. 25092 E-Mail: josh@verislawgroup.com
LLC, KSC Recovery, Inc., Kaiser Steel Corporation, and Kaiser Company Inc.	Attorneys for Defendants Evraz Oregon Steel Mills, Inc.
DATED:, 2013	DATED: MARGIN 14, 2013